

Greenwich Toy & Leisure Library Association Data Protection Policy

Heading	
Organisation	Greenwich Toy & Leisure Library Association
Scope of policy	<p>This policy applies to:</p> <ul style="list-style-type: none">• the UK office of Greenwich Toy & Leisure Library Association;• its branches and regions;• all sessional workers operating on behalf of Greenwich Toy & Leisure Library <p>It applies to paid staff and volunteers.</p>
Policy operational date	June 2010
Policy prepared by	Services Manager & IT/Administrator
Date	June 2015
Policy review date	May 2018

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Purpose of policy	<p>The purpose of this policy is to enable Greenwich Toy & Leisure Library Association to:</p> <ul style="list-style-type: none"> • comply with the law in respect of the data it holds about individuals; • follow good practice; • protect Greenwich Toy & Leisure Library Association’s supporters, staff and other individuals • protect the organisation from the consequences of a breach of its responsibilities.
Brief introduction to Data Protection Act 1998	Lasa Guide to Data Protection attached
Data Protection Principles	Principles attached
Personal data	This policy applies to information relating to identifiable individuals, even where it is technically outside the scope of the Data Protection Act, by virtue of not meeting the strict definition of ‘data’ in the Act.
Policy statement	<p>Greenwich Toy & Leisure Library Association will:</p> <ul style="list-style-type: none"> • comply with both the law and good practice • respect individuals’ rights • be open and honest with individuals whose data is held • provide training and support for staff and volunteers who handle personal data, so that they can act confidently and consistently <p>Greenwich Toy & Leisure Library Association recognises that its first priority under the Data Protection Act is to avoid causing harm to individuals. In the main this means:</p> <ul style="list-style-type: none"> • keeping information securely in the right hands, and • holding good quality information. <p>Secondly, the Act aims to ensure that the legitimate concerns of individuals about the ways in which their data may be used are taken into account. In addition to being open and transparent, Greenwich Toy & Leisure Library Association will seek to give individuals as much choice as is possible and reasonable over what data is held and how it is used.</p>
Key risks	<p>Greenwich Toy & Leisure Library Association has identified the following potential key risks, which this policy is designed to address:</p> <ul style="list-style-type: none"> • Breach of confidentiality (information being given out inappropriately) — especially at branch level. • Insufficient clarity about the range of uses to which data will be put — leading to

	<p>Data Subjects being insufficiently informed</p> <ul style="list-style-type: none"> • Failure to offer choice about data use when appropriate • Breach of security by allowing unauthorised access - especially at branch level. • Failure to establish efficient systems of managing changes to branch volunteers, leading to personal data being not up to date. • Harm to individuals if personal data is not up to date • Insufficient clarity about the way sessional workers' or volunteers' personal data is being used e.g. given out to general public. • Failure to offer choices about use of contact details for staff, volunteers, sessional workers or branch officers • Data Processor contracts
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Trustees	The Board of Trustees recognises its overall responsibility for ensuring that Greenwich Toy & Leisure Library Association complies with its legal obligations.
Data Protection Officer	<p>The Data Protection Officer is currently Deborah Cavill, Services Manager, with the following responsibilities:</p> <ul style="list-style-type: none"> • Briefing the board on Data Protection responsibilities • Reviewing Data Protection and related policies • Advising other staff on Data Protection issues • Ensuring that Data Protection induction and training takes place • Notification • Handling subject access requests • Approving unusual or controversial disclosures of personal data • Approving contracts with Data Processors
Specific other staff	The IT/Administrator, Richard Hudson will be responsible for electronic security and Data-Protection-related statements on publicity materials, letters etc.
Team/Department managers	Each team or department where personal data is handled is responsible for drawing up its own operational procedures (including induction and training) to ensure that good Data Protection practice is established and followed.
Staff & volunteers	All staff and volunteers are required to read, understand and accept any policies and procedures that relate to the personal data they may handle in the course of their work.
Enforcement	Significant breaches of this policy will be handled under Greenwich Toy & Leisure Library Association's disciplinary procedures.

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Scope	Because confidentiality applies to a much wider range of information than Data Protection, Greenwich Toy & Leisure Library has a separate Confidentiality Policy.
Understanding of confidentiality	<p>Access to information must be on a “need to know” basis. No one must have access to information unless it is relevant to their work.</p> <p>Working with children may mean careful assessment as to how much information will be shared with their parents.</p> <p>In relation to Safeguarding Children the organisation have the right to break confidentiality and this is noted in the Safeguarding Children policy.</p>
Communication with Data Subjects	Greenwich Toy & Leisure Library Association will have a privacy statement for Data Subjects, setting out how their information will be used. This will be available on request, and a version of this statement will also be used on the Greenwich Toy & Leisure Library Association’s web site.
Communication with staff	Staff, volunteers and sessional workers will be required to sign a short statement indicating that they have been made aware of their confidentiality responsibilities. Final decision to disclose must be with the Data Protection Officer.
Authorisation for disclosures not directly related to the reason why data is held	Where anyone within Greenwich Toy & Leisure Library Association feels that it would be appropriate to disclose information in a way contrary to the confidentiality policy, or where an official disclosure request is received, this will only be done with the authorisation of the Data Protection Officer. All such disclosures will be documented.

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Scope	This section of the policy only addresses security issues relating to personal data. It does not cover security of the building, business continuity or any other aspect of security.
Specific risks	<p>Greenwich Toy & Leisure Library Association has identified the following risks:</p> <ul style="list-style-type: none"> • Staff or volunteers with access to personal information could misuse it. • Sessional workers or, more likely, volunteers could continue to be sent information after they have stopped working for Greenwich Toy & Leisure Library Association, if their records are not updated promptly. • Poor web site security might give a means of access to information about individuals once individual details are made accessible on line. • Staff may be tricked into giving away information, either about supporters or colleagues, especially over the phone, through “social engineering”. • Staff or volunteer contact details could be given over the phone.
Setting security levels	Access to information on the main computer system will be controlled by function.
Security measures	<p>Each co-ordinator will have all information protected by password, managed by the IT/Administrator.</p> <p>All personal information for staff, volunteers and members will be kept under lock & key at all times.</p> <p>No personal information should be left un-attended on desks or in files.</p>
Business continuity	
Personal safety	

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Accuracy	<p>Greenwich Toy & Leisure Library Association will regularly review its procedures for ensuring that its records remain accurate and consistent and, in particular:</p> <ul style="list-style-type: none"> • ICT systems will be designed, where possible, to encourage and facilitate the entry of accurate data. • Data on any individual will be held in as few places as necessary, and all staff and volunteers will be discouraged from establishing unnecessary additional data sets. • Effective procedures will be in place so that all relevant systems are updated when information about any individual changes. • Staff or volunteers who keep more detailed information about individuals will be given additional guidance on accuracy in record keeping.
Updating	Information is updated on a regular basis.
Storage	Computer System TOLIS used for all information is Password protected. All hard copies are filed under lock & key with named key holders.
Retention periods	<p>Greenwich Toy & Leisure Library Association will establish retention periods for at least the following categories of data:</p> <ul style="list-style-type: none"> • Members – ongoing unless formally cancelled membership • Supporters and users of services who elect not to become members – ongoing unless formally cancelled • Volunteers – Whilst in service with the organisation and until the end of a financial year – for record purposes only. • Staff – archived at end of year after leaving. • Sessional workers – archived at end of year after leaving.
Archiving	Archived paper records of members are stored electronically for a period of 7 years.

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Responsibility	Any subject access requests will be handled by the Data Protection Officer within a time limit of 30 days.
Procedure for making request	<p>Subject access requests must be in writing. All staff and volunteers are required to pass on anything which might be a subject access request to the Data Protection Officer without delay.</p> <p>All those making a subject access request will be asked to identify any services/projects or sessional workers who may also hold information about them, so that this data can be retrieved.</p>
Provision for verifying identity	Where the individual making a subject access request is not personally known to the Data Protection Officer their identity will be verified before handing over any information.
Charging	There is no charge for subject access.
Procedure for granting access	The required information will be provided in permanent form unless the applicant makes a specific request to be given supervised access in person.

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Commitment	<p>Greenwich Toy & Leisure Library Association is committed to ensuring that in principle Data Subjects are aware that their data is being processed and</p> <ul style="list-style-type: none"> • for what purpose it is being processed; • what types of disclosure are likely; and • how to exercise their rights in relation to the data.
Procedure	<p>Data Subjects will generally be informed in the following ways:</p> <ul style="list-style-type: none"> • Staff: in the staff handbook • Volunteers: in the volunteer support pack • Sessional workers: in the staff handbook • Members: upon registration • Supporters: when they sign up (on paper, on line or by phone) for services. <p>Standard statements will be provided to staff at the UK office and to branches for use on forms where data is collected.</p> <p>Whenever data is collected, the number of mandatory fields will be kept to a minimum and Data Subjects will be informed which fields are mandatory and why.</p>
Responsibility	<p>Standard personal information is the responsibility of the IT/Administrator in terms of Data Protection.</p> <p>Service information held by Home Visiting team is restricted to this service and Services Manager as Data Protection Officer.</p>

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Underlying principles	<p>Consent will normally not be sought for most processing of information about staff and sessional workers, with the following exceptions:</p> <ul style="list-style-type: none"> • Staff details will only be disclosed for purposes unrelated to their work for Greenwich Toy & Leisure Library Association (e.g. financial references) with their consent. • Sessional workers, or other staff working from home, will be given the choice over which contact details are to be made public. <p>Information about volunteers will be made public according to their role, and consent will be sought for (a) the means of contact they prefer to be made public, and (b) any publication of information which is not essential for their role.</p> <p>Information about members and supporters will only be made public with their consent. (This includes photographs.)</p> <p>‘Sensitive’ data about members and supporters (including health information) will be held only with the knowledge and consent of the individual.</p>
Forms of consent	In most instances the organisation will accept verbal consent and this will be documented. In some cases written consent will be required.
Opting out	Members will always be approached for external mailings (usually requested by the Borough) but in the main will be sent by the Toy Library and not given as a mailing list.
Withdrawing consent	Service data is required by funders and for this purpose information may be stored for a given period. Personal details will be requested for monitoring purposes and therefore withdrawing consent for information to be given will not apply.

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Underlying principles	<p>Greenwich Toy & Leisure Library Association will treat the following unsolicited direct communication with individuals as marketing:</p> <ul style="list-style-type: none"> • seeking donations and other financial support; • promoting any Greenwich Toy & Leisure Library Association services; • promoting membership to supporters; • promoting sponsored events and other fundraising exercises; • marketing on behalf of any other external company or voluntary organisation.
Opting out	<p>Whenever data is first collected which might be used for any marketing purpose, this purpose will be made clear, and the Data Subject will be given a clear opt out. If it is not possible to give a range of options, any opt-out which is exercised will apply to all Greenwich Toy & Leisure Library Association marketing.</p>
Sharing lists	<p>Greenwich Toy & Leisure Library Association do not make it a practice to share lists. They will take the lead to send information beneficial to the members from other organisations.</p>
Electronic contact	<p>Greenwich Toy & Leisure Library Association will only carry out telephone marketing where consent has been given in advance, or the number being called has been checked against the Telephone Preference Service.</p> <p>Whenever e-mail addresses are collected, any future use for marketing will be identified, and the provision of the address made optional.</p>

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Documentation	Information for staff and sessional workers is contained in the staff handbook. Information for branches is contained in branch guidance.
Other related policies	Confidentiality Policy. Volunteers Policy.
Induction	All staff who have access to any kind of personal data will have their responsibilities outlined during their induction procedures. Data Protection will be included in foundation training for branch volunteers and sessional workers.
Continuing training	Greenwich Toy & Leisure Library Association will provide opportunities for staff to explore Data Protection issues through training, team meetings, and supervisions.
Procedure for staff signifying acceptance of policy	Co-ordinators and Managers will be required to sign the Data Protection Policy acceptance. Staff, volunteers and sessional workers need to sign that data protection procedures are adhered to.

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Responsibility	Services Manager & Management Committee will carry out the next policy review and place on organiser.
Procedure	Initial review of Data Protection policy will be carried out at the January Planning Meeting of all staff. Any amendments will be taken to the Management Committee Planning Meeting to be reviewed and agreed.

Notes

Data Controller

The Data Controller is the legal 'person' responsible for complying with the Data Protection Act. It will almost always be the organisation, not an individual staff member or volunteer. Separate organisations (for example a charity and its trading company) are separate Data Controllers. Where organisations work in close partnership it may not be easy to identify the Data Controller. If in doubt, seek guidance from the Information Commissioner.

Data Processor

When work is outsourced, which involves the contracting organisation in having access to personal data, there must be a suitable written contract in place, paying particular attention to security. The Data Controller remains responsible for any breach of Data Protection brought about by the Data Processor.

Fair processing conditions

Schedule 2 of the Data Protection Act lays down six conditions, at least one of which must be met, in order for any use of personal data to be fair. These are (in brief):

- With consent of the Data Subject
- If it is necessary for a contract involving the Data Subject
- To meet a legal obligation
- To protect the Data Subject's 'vital interests'
- In connection with government or other public functions
- In the Data Controller's 'legitimate interests' provided the Data Subject's interests are not infringed

Notification

All Data Controllers have to consider whether they are exempt from Notification. If they are not exempt, they have to Notify. This means completing a form for the Information Commissioner, and paying a fee of £35 a year. The Notification form covers:

- The purposes for which personal data is held (from a standard list)
- and for each purpose (again from standard lists):

- The types of Data Subject about whom data is held
- The types of information that are held
- The types of disclosure that are made
- Any transfers abroad

There is probably no need to mention the details of the organisation's Notification in the policy. The Notification entry has to be reviewed each year, and may have to change if the organisation changes its processing in significant ways.

Subject access

Individuals have a right to know what information is being held about them. The basic provision is that, in response to a valid request (including the fee, if required), the Data Controller must provide a permanent, intelligible copy of all the personal data about that Data Subject held at the time the application was made. The Data Controller may negotiate with the Data Subject to provide a more limited range of data (or may choose to provide more), and certain data may be withheld. This includes some third party material, especially if any duty of confidentiality is owed to the third party, and limited amounts of other material. ("Third Party" means either that the data is about someone else, or someone else is the source.)

Greenwich Toy & Leisure Library Association

Privacy statement

When you request information from Greenwich Toy & Leisure Library Association, sign up to any of our services or buy things from us, Greenwich Toy & Leisure Library Association obtains information about you. This statement explains how we look after that information and what we do with it.

We have a legal duty under the Data Protection Act to prevent your information falling into the wrong hands. We must also ensure that the data we hold is accurate, adequate, relevant and not excessive.

Normally the only information we hold comes directly from you. Whenever we collect information from you, we will make it clear which information is required in order to provide you with the information, service or goods you need. You do not have to provide us with any additional information unless you choose to. We store your information securely on our computer system, we restrict access to those who have a need to know, and we train our staff in handling the information securely.

Most of our services are delivered in house. If you have signed up to a class or other service we will also pass your details to the professional worker providing that service. The branch or sessional worker may hold additional information about your participation in local activities.

We would also like to contact you in future to tell you about other services we provide, and ways in which you might like to support Greenwich Toy & Leisure Library Association. You have the right to ask us not to contact you in this way. We will always aim to provide a clear method for you to opt out. You can also contact us directly at any time to tell us not to send you any future marketing material.

Very occasionally we carry out a joint mailing with carefully selected other organisations, in order to tell you about products and services we think you might be interested in. Again, you have the right to opt out of this.

You have the right to a copy of all the information we hold about you (apart from a very few things which we may be obliged to withhold because they concern other people as well as you). To obtain a copy, either ask for an application form to be sent to you, or write to the Data Protection Officer at Greenwich Toy & leisure Library Association. We aim to reply as promptly as we can and, in any case, within the legal maximum of 30 days.

Appendix B: Confidentiality statement for staff and volunteers

When working for Greenwich Toy & Leisure Library Association, you will often need to have access to confidential information which may include, for example:

- Personal information about individuals who are supporters or otherwise involved in the activities organised by Greenwich Toy & Leisure Library Association.
- Information about the internal business of Greenwich Toy & Leisure Library Association.
- Personal information about colleagues working for Greenwich Toy & Leisure Library Association.

Greenwich Toy & Leisure Library Association is committed to keeping this information confidential, in order to protect people and Greenwich Toy & Leisure Library Association itself. 'Confidential' means that all access to information must be on a need to know and properly authorised basis. You must use only the information you have been authorised to use, and for purposes that have been authorised. You should also be aware that under the Data Protection Act, unauthorised access to data about individuals is a criminal offence.

You must assume that information is confidential unless you know that it is intended by Greenwich Toy & Leisure Library Association to be made public. Passing information between a branch and the UK office, or between Greenwich Toy & Leisure Library Association and a mailing house, or *vice versa* does not count as making it public, but passing information to another organisation does count.

You must also be particularly careful not to disclose confidential information to unauthorised people or cause a breach of security. In particular you must:

- not compromise or seek to evade security measures (including computer passwords);
- be particularly careful when sending information between the UK office and branches;
- not gossip about confidential information, either with colleagues or people outside Greenwich Toy & Leisure Library Association;
- not disclose information — especially over the telephone — unless you are sure that you know who you are disclosing it to, and that they are authorised to have it.

If you are in doubt about whether to disclose information or not, do not guess. Withhold the information while you check with an appropriate person whether the disclosure is appropriate.

Your confidentiality obligations continue to apply indefinitely after you have stopped working for Greenwich Toy & Leisure Library Association.

I have read and understand the above statement. I accept my responsibilities regarding confidentiality.

Signed:

Date: